

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SLOAN VALVE COMPANY

Plaintiff,

vs.

ZRM INDUSTRIES, ET AL.,

Defendants.

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Case No. 1:25-cv-06289

Judge: Honorable Mary M. Rowland

JOINT MOTION FOR EXTENSION OF TIME FOR PARTIES
TO AMEND THE PLEADINGS AND/OR ADD PARTIES

Pursuant to Fed. R. Civ. R. 6(B)(1)(A) Plaintiff Sloan Valve Company (“*Plaintiff*” or “*Sloan*”) and Defendants ZRM Industries, Consolidated Global Dynamics, and Donald Crawford (“*Defendants*” together with Plaintiff the “*Parties*”) file this Joint Motion for Extension of Time for Parties to Amend the Pleadings and/or Add Parties by an additional thirty (30) days from January 5, 2026, up to and including February 4, 2026.

On October 29, 2025, this Court issued a Minute Order (ECF #36) (the “*Order*”) requiring, in part, that should Plaintiff seek to amend the pleadings and/or add parties it is done on or before January 5, 2026. On November 26, 2025, the Parties exchanged the first sets of written discovery requests. Considering ongoing settlement discussions, the press of business, and the holidays, the Parties have agreed to extend the deadline to respond to initial discovery requests from December 26, 2025, until January 23, 2026. Accordingly, the Parties have not yet exchanged discovery responses. Because of this, additional time is needed for each to receive and review responses to first set of discovery requests, and, if either chooses, to amend the pleadings and/or add parties. This first request for an extension of time is made in good faith and not for the purpose of delay.

Accordingly, the Parties respectfully request that this Court grant them **thirty (30) additional days**, up to and including **February 4, 2026**, to amend the pleadings and/or add parties.

Dated: January 5, 2026

Respectfully Submitted,

GOLDBERG KOHN LTD.

/s/Michael L. Sullivan (via e-mail consent)

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Counsel for Plaintiff Sloan Valve Company

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was sent this 5th day of January 2026 via the Court's electronic filing system to all counsel of record.

/s/ Kyle D. Stroup

KYLE D. STROUP (*pro hac vice*)